

ATTACHMENT A

Grand River Mutual Telephone Corporation (Cont'd)

Grand River has been undergoing a network upgrade to meet the needs of the public and to comply with regulatory mandates. Based on the aforementioned, Grand River respectfully requests a waiver until March 31, 1999 to complete its network configuration.

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Haxtun Telephone Company

Haxtun Telephone Company, ("Haxtun"), serves rural customers in Colorado. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,874 access lines, of which there are 18 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Haxtun is in the process of replacing the current Stromberg-Carlson DCO architecture with a Nortel host/remote architecture, containing the software generic of 406.10. On December 8, 1997, Haxtun filed a petition before the FCC requesting an extension to June 30, 1998, in order to complete the installation to comply with the CIC/CAC requirement. On December 24, 1997, the FCC granted the extension. As part of this installation, Haxtun will activate the FLEX ANI in order to send payphone coding digits.

Based on the aforementioned, Haxtun respectfully requests a waiver until June 30, 1998, which will correspond with the existing extension granted by the FCC.⁴

⁴ *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule of Several Companies, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70; 97-72; 97-76; 97-64; 97-71; 97-69, Order released 12/24/97, DA 97-2691.*

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Kinsman Mutual Telephone Company

Kinsman Mutual Telephone Company, ("Kinsman"), serves rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 90 access lines, of which there is one (1) payphone line that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Kinsman must consider the FLEX ANI solution. The FLEX ANI solution will require a new switch. Economic constraints have prevented the company from completing either alternative.

Based on the aforementioned, Kinsman respectfully requests a waiver until April 30, 1999, to provide payphone coding digits via FLEX ANI.

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Lathrop Telephone Company

Lathrop Telephone Company, ("Lathrop"), serves rural customers in Missouri. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,350 access lines, of which there are six (6) payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Lathrop is in the process of completing a switch replacement and was anticipating the switch to be operational by the end of April 1998. However, due to a recent fiber cut SS7 signaling was lost. As a result of this fiber cut, Lathrop must conduct additional testing to determine if any switching and/or signaling improvements to the new switch will be necessary.

Based on the aforementioned, Lathrop respectfully requests a waiver until June 1, 1998, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

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Leaf River Telephone Company

Leaf River Telephone Company, ("Leaf River"), serves rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 600 access lines, of which there are six (6) payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Leaf River is in the process of implementing a generic upgrade to its switch. This was a planned upgrade with an estimated cost of \$24,000. The planned completion date is May 1, 1998.

Based on the aforementioned, respectfully requests a waiver until May 1, 1998, to complete its upgrade and provide payphone coding digits via FLEX ANI.

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Leonore Mutual Telephone Company

Leonore Mutual Telephone Company, ("Leonore"), serves rural customers in Illinois. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 150 access lines, of which there are two (2) payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Leonore must consider the FLEX ANI solution. The FLEX ANI solution will require a new switch. Due to economic constraints, Leonore has not pursued implementing a new switch until now. To replace the switch will cost an estimated \$150,000. Leonore anticipates the new switch to be operational with FLEX ANI feature by April 30, 1999.

Based on the aforementioned, Leonore respectfully requests a waiver until April 30, 1999, to complete its upgrade and provide payphone coding digits via FLEX ANI.

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Mobridge Telecommunications Company

Mobridge Telecommunications Company, ("Mobridge"), serves rural customers in South Dakota. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 2,500 access lines, of which there are 40 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Currently, services are provisioned from an Ericsson AXE-10 host switch which is owned by Mobridge and maintained by US West ("USWC"). To provide FLEX ANI will require a software patch from Ericsson at an estimated cost of \$15,000 and would be installed by USWC on their timetable. Mobridge is in the process of implementing its own digital network to eliminate the reliance on USWC. Rather than expend dollars for a patch, Mobridge would prefer to delay FLEX ANI implementation until the new digital switching network is operational, which is scheduled to be operational by April 1, 1999. Mobridge believes a deferral of FLEX ANI would be in the best interest of the public.

Based on the aforementioned, Mobridge respectfully requests a waiver until April 1, 1999, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

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Mound Bayou Telephone Company

Mound Bayou Telephone Company, ("Mound Bayou"), serves rural customers Mississippi. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,000 access lines in service, of which there are 4 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Mound Bayou currently provides service to its customers via a Stromberg-Carlson switch, which is not capable of an SS7 solution or FLEX ANI. Mound Bayou determined, based on its customers needs and regulatory considerations, that a switch replacement would be the best alternative. The switch selection process has been initiated and Mound Bayou believes that once a switch vendor has been selected it could have the new switch operational with FLEX ANI feature by December 31, 1999.

Based on the aforementioned, Mound Bayou respectfully requests a waiver until December 31, 1999, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

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Oregon Farmers Mutual Telephone Company

Oregon Farmers Mutual Telephone Company, ("Oregon Farmers"), serves rural customers in Missouri. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,100 access lines of which six (6) are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Oregon Farmers must consider the FLEX ANI solution. The FLEX ANI solution will require a software upgrade with an estimated cost of \$20,000. Due to economic constraints, Oregon Farmers has not pursued implementing FLEX ANI until this time. Oregon Farmers anticipates the software upgrade and translations will be complete by September 30, 1998.

Based on the aforementioned, Oregon Farmers respectfully requests a waiver until September 30, 1998, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

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Peoples Telephone Company

Peoples Telephone Company, ("Peoples"), serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,500 access lines of which seven (7) are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Peoples must consider the FLEX ANI solution. The FLEX ANI solution will require a software upgrade with an estimated cost of \$15,000. Due to economic constraints, Peoples has not pursued implementing FLEX ANI until this time. Peoples anticipates FLEX ANI becoming operational by September 30, 1998.

Based on the aforementioned, Peoples respectfully requests a waiver until September 30, 1998, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

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Pioneer Telephone Company

Pioneer Telephone Company, ("Pioneer"). serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 14,880 access lines of which there are 137 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

In order to meet with the FCC requirements and the public's interest, Pioneer determined that software upgrades to its host/remote network would meet all parties needs. The total estimated cost of the completing the upgrades is \$25,150, which represents costs for upgrading four (4) remotes and one (1) host switch. Pioneer is in the process of implementing this network change and anticipates completion of the upgrades by June 30, 1998.

Based on the aforementioned, Pioneer respectfully requests a waiver until June 30, 1998, to complete its network upgrade and provide payphone coding digits via FLEX ANI.

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Price County Telephone Company

Price County Telephone Company, ("Price County"), serves rural customers in Wisconsin. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 4,550 access lines of which there are 47 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

In order to meet with the FCC requirements and the public's interest, Price County determined that software upgrades are achievable. The total estimated cost of the completing the upgrades is \$14,325. Price County is in the process of implementing the upgrades and anticipates completion of the upgrades by June 30, 1998.

Based on the aforementioned, Price County respectfully requests a waiver until June 30, 1998, to complete its network upgrade and provide payphone coding digits via FLEX ANI.

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Rib Lake Telephone Company

Rib Lake Telephone Company, ("Rib Lake"), serves portions of Taylor and Price County in Wisconsin. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,230 access lines in which 15 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Rib Lake is currently in the process of replacing its current switch. The new switch will be a remote off the Rhinelander switch. The estimated completion of the switch replacement is April 30, 1998. Upon completion of the switch replacement Rib Lake will have the FLEX ANI feature operational.

Based on the aforementioned, Rib Lake respectfully requests a extension to April 30, 1998, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

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Rio Virgin Telephone

Rio Virgin Telephone Company, ("Rio Virgin"), serves one exchange in Mesquite, Nevada and a remote in Littlefield, Arizona, which provides service to 5,600 access lines. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP.

Rio Virgin is in the process of installing a new DMS 100 switch, which will provide the FLEX ANI capability. Rio Virgin anticipates the switch to be operational by December 31, 1998.

Based on the aforementioned, Rio Virgin respectfully requests an extension to December 31, 1998, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

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Roosevelt County Telephone Cooperative

Roosevelt County Telephone Cooperative, ("Roosevelt"), serves rural customers in New Mexico. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 2,500 access lines of which 23 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Roosevelt is in the process of installing new switches that will be capable of FLEX ANI by March 30, 1998. However, verification of routing and additional testing will require an additional thirty days. Roosevelt anticipates the new switches to be fully operational no later than April 30, 1998.

Based on the aforementioned, Roosevelt respectfully requests a waiver until April 30, 1998, to complete the installation of its new switches and provide payphone coding digits via FLEX ANI.

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Rural Telephone Company

Rural Telephone Company, Inc., ("Rural"), serves rural customers in Idaho and Nevada. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 1,200 access lines in service, of which 18 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Rural is currently in the process of implementing its modernization plan that calls for upgrading all of its switches. Upon completion of the upgrades, Rural will be capable of FLEX ANI. The modernization of the switches is planned to be complete by December 31, 1998. The public interest is not served by causing investment for this service which will be replaced within nine (9) months.

Based on the aforementioned information, Rural respectfully requests a waiver until December 31, 1998, to complete its modernization plan and provide payphone coding digits via FLEX ANI.

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Sierra Telephone Company

Sierra Telephone Company, ("Sierra"), serves rural customers in California. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 20,000 access lines of which 193 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Sierra provides service to its customers via a DMS 100. The current generic software does not have the capability to pass digits via FLEX ANI. Sierra had planned to upgrade the generic software by July 31, 1998. To meet the March 9, 1998, Sierra intends to use LIDB. The long term solution is intended to be transmit payphone coding digits via FLEX ANI.

Based on the aforementioned, should the FCC mandate FLEX ANI as the means to transmit payphone coding Sierra respectfully requests a waiver until July 31, 1998, to complete its generic software upgrade and to provide payphone coding digits via FLEX ANI.

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South Central Communications

South Central Communications, ("South Central "), serves rural customers in Iowa. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 2,411 access lines, of which there are 11 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

South Central acquired three exchanges in Iowa from US West ("USWC"). The switches for the three exchanges are remotes off a US West company host switch. One of the requirements of the acquisition is that South Central remove the remotes from the USWC switch by October 10, 1998. South Central is in the process of implementing this change, installing DMS 10s. The new switches will be FLEX ANI capable no later than October 11, 1998.

Based on the aforementioned, South Central respectfully requests a waiver until October 11, 1998, to complete its network upgrade and provide payphone coding digits via FLEX ANI.

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Stayton Cooperative Telephone Company

Stayton Cooperative Telephone Company, ("Stayton"), serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 6,350 access lines, of which there are 36 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

The FLEX ANI solution will require a switch upgrade with an estimated cost of \$15,000. Stayton anticipates implementing the software upgrade by June 30, 1998.

Based on the aforementioned, Stayton respectfully requests a waiver until June 30, 1998, to complete its network upgrade and provide payphone coding digits via FLEX ANI.


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Table Top Telephone Company, Inc.

Table Top Telephone Company, Inc., ("Table Top"), serves rural customers in Arizona. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 4,200 access lines, of which there are 194 payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Table Top intends to provide payphone coding digits via FLEX ANI. The FLEX ANI feature resides in all five of Table Top's switches, however due to economic constraints has not been able to activate the feature. The activation fee for all five switches is estimated to be \$12,500. Table Top has filed a request with the FCC to increase its USF Cap from its current level of \$219,300 to approximately \$460,000. This filing is currently under review by the FCC. Approval of this filing would significantly lift the financial burden that Table Top is currently experiencing, and would make the implementation of FLEX ANI financially feasible. Table Top anticipates activating the FLEX ANI capability by March 31, 1999.

Based on the aforementioned, Table Top respectfully requests an extension until March 31, 1999, to complete its network upgrade and provide payphone coding digits via



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Tatum Telephone Company

Tatum Telephone Company, ("Tatum"), serves rural customers in Texas. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 815 access lines, of which there are seven (7) payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

Tatum is in the process of replacing the current Stromberg-Carlson DCO architecture with a Nortel host/remote architecture. On December 8, 1997, Tatum filed a petition before the FCC requesting an extension to June 30, 1998, in order to complete the installation to comply with the CIC/CAC requirement. On December 24, 1997, the FCC granted the extension. As part of this installation, Tatum will activate the FLEX ANI in order to send payphone coding digits.

Based on the aforementioned, Tatum respectfully requests a waiver until June 30, 1998, which will correspond with the existing extension granted by the FCC.⁵

⁵ *Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule of Several Companies*, NSD File Nos. 97-74; 97-63; 97-78; 97-75; 97-66; 97-67; 97-65; 97-68; 97-73; 97-70; 97-72; 97-76; 97-64; 97-71; 97-69 Order released 12/24/97, DA 97-2691.

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Terril Telephone Company

Terril Telephone Company, ("Terril"), serves rural customers in Iowa. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 480 access lines, of which there are two (2) payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

An SS7 solution is not available at this time, therefore Terril must consider the FLEX ANI solution. The FLEX ANI solution will require a switch replacement with an estimated cost of \$200,000. In reviewing alternatives to provide FLEX ANI through the switch, Terril found it to be less costly to replace the switch than to upgrade generic software. Due to economic constraints, Terril has not pursued implementing FLEX ANI until this time. Terril just recently received loan notification from RUS, which will allow them to pursue interim financing for a switch replacement. Upon approval of interim financing, Terril anticipates having the new switch operational by April 30, 1999.

Based on the aforementioned, Terril respectfully requests a waiver until April 30, 1999, to complete its switch replacement and provide payphone coding digits via FLEX ANI.

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Trans-Cascades Telephone Company

Trans-Cascades Telephone Company, ("Trans-Cascades"), serves rural customers in Oregon. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 162 access lines in service, of which 2 are payphone lines that will not be capable of transmitting FLEX ANI by March 9, 1998.

The FLEX ANI solution will require a software upgrade with an estimated cost of \$15,000. Due to the number of payphones, Trans-Cascades has not pursued implementing FLEX ANI until this time. Trans-Cascades anticipates FLEX ANI becoming operational by December 31, 1998.

Based on the aforementioned, Trans-Cascades respectfully requests a waiver until December 31, 1998, to complete its software upgrade and provide payphone coding digits via FLEX ANI.

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West River Communications, Inc.

West River Communications, Inc. ("West River"), serves approximately 15, 000 rural customers in South Dakota and North Dakota. The company will not meet the March 9, 1998 deadline for transmitting payphone coding digits if FLEX ANI is mandated as the means for sending the digits to the PSP. There are approximately 5,800 access lines, of which there are 51 payphone lines, that will not be capable of transmitting FLEX ANI by March 9, 1998.

West River has two unique circumstances with regard to the implementation of FLEX ANI. The first involves service provisioned from an Ericsson AXE-10 host switch, owned by West River in Bismarck, for the McClusky, Underwood and Goodrich exchanges. This switch is maintained by USWC under contract. For the Ericsson AXE 10 to provide FLEX ANI, a software patch from Ericsson will be required at an estimated cost of \$15,000 a switch. Installation would be performed by USWC on their timetable. West River is in the process of installing its own digital network and installing a switch to eliminate the reliance on USWC. Rather than expend dollars for a patch, West River would prefer to delay FLEX ANI implementation until the new digital network and switch are operational, which is scheduled to be completed April 1, 1999. West River feels the deferral of FLEX ANI would be in the best interest of the public.

The second involves service provisioned from a 1AESS host electronic analog switch in Dickinson for the Glen Ulin, Elgin, Flasher, Carson, New Salem and Hebron exchanges. The host switch in Dickinson is owned and maintained by USWC. West River is in the

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West River Communications, Inc. (Cont'd)

process of upgrading its own digital network and installing a switch to eliminate the reliance on USWC. The new switches are expected to be operational by July 31, 1998.

Based on the aforementioned, West River respectfully requests a waiver until April 1, 1999 for the McClusky, Underwood, and Goodrich exchanges, and a waiver until July 31, 1998 for the Glen Ulin, Elgin, Flasher, Carson, New Salem, and Hebron exchanges.